

Global Partners Digital would like to thank UNESCO for this opportunity to provide input into the development of the Internet Universality Indicators.

In line with the guidance provided for the second phase of consultation, we have responded to the three questions asked. In the spreadsheet, each question is a column heading with the questions and indicators in each of the five categories listed in rows.

Our feedback can be broadly summarised to include:

- Suggestions to improve the accuracy and consistency in the language and terminology used in the questions and indicators
- Identification of the need for clarification of terms used in certain indicators
- Suggestions for additional themes, questions and indicators

Finally, we have also included sources and means of verification with respect to some of the indicators.

We look forward to the finalisation of the UNESCO Internet Universality Indicators.

Category R - Rights	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
THEME A – POLICY, LEGAL AND REGULATORY FRAMEWORK			
<p>A.1 Is there a legal framework for the enjoyment and enforcement of human rights which is consistent with international rights agreements and with the rule of law?</p>		<p>We suggest replacing "international rights agreements" with "relevant international human rights law and standards" as these are more standard terms and include non-treaty based sources.</p> <p>We also suggest, either in the question itself, or in accompanying notes, specifying which agreements, treaties, standards, etc., the domestic legal framework is being assessed against, since some won't be relevant to the issue of internet universality.</p>	
<p>Existence of an established legal framework which is consistent with international (including regional) rights agreements, and evidence that it is respected and enforced by government</p>		<p>We suggest deleting "established" as it doesn't add anything substantive to "a legal framework".</p> <p>We suggest deleting "(including regional)". If retained, it would mean the indicator assessing different countries against different standards depending on which regional unions they were members of. Regional instruments may also differ in their scope and content from international instruments meaning it would not be clear against which standards the domestic framework would be assessed.</p> <p>We suggest replacing "agreements" with the specific instruments and standards which are relevant. The Convention on the Rights of Migrant Workers, for example, is an international human rights agreement, but is not relevant to the internet or universality. This could also be done by inserting "relevant" before "international" and including the list in accompanying notes.</p> <p>We suggest replacing "government" with "relevant state organs" as respect and enforcement is not just the role of government, but all public bodies, including the courts.</p>	
<p>A.2 Does the law recognise that rights and laws apply equally online and offline?</p>		<p>We suggest replacing this question with "Is there a legal framework which recognises that rights apply equally online and offline?".</p> <p>Alternatively, we suggest deleting "and laws" as it cannot be assumed that "the law" could (or should) recognise that all law applies equally offline and online. A law regulating, for example, planning or or a Criminal Code's provisions on physical acts of violence would not apply "online".</p>	
<p>Evidence that the principle of online/offline equivalence is accepted in principle and implemented in practice</p>			
<p>A.3 Do citizens have access to due process to address violations of rights, online and offline, by state or non-state actors?</p>		<p>We suggest replacing "due process" with "justice, including due process guarantees". "Access to justice" is broader than simply "due process" but all elements of access to justice are necessary to ensure effective enforcement of human rights, including remedies where violations are found.</p> <p>We suggest replacing "citizens" with "individuals". Non-citizens, including immigrants, refugees and asylum-seekers, should also enjoy such access.</p>	

Category R - Rights	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
Legal framework for due process		<p>We suggest that this indicator (or a number of indicators) should identify different elements that ensure effective access to justice, which includes due process guarantees, for example:</p> <ul style="list-style-type: none"> - Sufficient numbers of courts (or online access to justice mechanisms) for individuals to bring human rights claims; - The provision of legal aid to ensure that everyone can afford to bring human rights claims; - Evidence of an independent judiciary and legal profession; - The availability of appropriate and effective remedies for human rights violations. 	
Availability of arrangements for redress in terms of service of online service providers		We suggest deleting indicator as it is unclear what this means or whether it could be interpreted as supporting certain forms of regulation/intermediary liability which could be problematic for freedom of expression.	
	We suggest adding as a new indicator, "Existence of a legal framework protecting human rights that extends to businesses, as well as the government and other public authorities, and which includes the ability for individuals to bring claims alleging breaches of human rights against businesses".		
A.4 Are law officers, judges and legal professionals trained in issues relating to the Internet and human rights?		If "law officers" is meant to refer to the police, we suggest replacing the term with "law enforcement officers".	
Availability of relevant courses and proportions of relevant personnel who have undertaken or completed training			
	We suggesting adding as a new question, "Is there a national human rights institution which fully complies with the Paris Principles and whose scope of work includes human rights online?"		
THEME B – FREEDOM OF EXPRESSION			
B.1 Is freedom of expression guaranteed in law, respected in practice, and widely exercised?			
Constitutional or legal guarantee of freedom of expression consistent with ICCPR Article 19, and evidence that it is respected and enforced by government		We suggest replacing "government" with "state organs". Respect and enforcement is not just the role of government, but all public bodies, including the courts.	
Constitutional or legal guarantee of press/media freedom		We suggest adding "and evidence that it is respected and enforced by relevant state organs" to ensure consistency.	
Assessment by credible agencies of extent and diversity of expression online and offline		We suggest deleting "Assessment by credible agencies of" as this is the source of the information, not part of the indicator.	
B.2 Are any restrictions on freedom of expression in policy and practice narrowly defined, transparent and implemented in accordance with international rights agreements and HRC resolutions?		We suggesting replacing this with "Are any restrictions on freedom of expression in policy and practice consistent with international human rights law and standards". This simplifies the question and the reference to international human rights law and standards covers legal certainty, transparency, proportionality, etc.	
Legal restrictions on freedom of expression are consistent with international rights agreements (including regional agreements) and respected by government	We suggest adding further indicators which include the assessment of particular forms of content regulation such as censorship, blasphemy laws, defamation laws, and intermediary liability.	We suggest deleting "legal". The question isn't limited to restrictions in law, but also in practice.	
B.3 Is there significant ex ante or ex post censorship of specific content posted on online services, applications or websites, and on what grounds is this exercised?		<p>We suggest deleting "significant" as it's not clear why censorship has to be significant to be a concern.</p> <p>We suggest replacing "content posted on online services, applications or websites" with "forms of online content" for clarity.</p>	
Quantitative and qualitative evidence of ex ante and ex post censorship			

Category R - Rights	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
B.4 Under what conditions does the law hold platforms and other online service providers liable for content published by them?		We think that this question risks confusing content published by the platforms with content generated by users and hosted / shared on that platform. We suggest rewording as "Under what conditions does the law hold platforms and other online service providers liable for content generated or shared by users on that platform?"	
Legal framework for intermediary liability and content regulation is consistent with international rights agreements (including regional agreements) and proportionally implemented		We suggest deleting "(including regional agreements)" for the above reasons, and replacing with "agreements" with "law and standards". We suggest deleting "proportionally implemented" as proportionality is already part of international human rights law and standards.	
B.5 What proportion of the population generates online content, including social media?		We suggest deleting the reference to social media (e.g "including social media") as it's not clear why social media is being singled out.	
Numbers of bloggers, microbloggers and users of social media services per hundred population and per hundred Internet users			
B.6 Are low-cost online services available which enable citizens and civil society organisations to make use of the Internet to express their views?		We suggest replacing "citizens" with "individuals" for the above reasons.	
Availability of low-cost blogging and webhosting services			
Legal restrictions, if any, on access to such services		We suggest deleting "legal".	
Incidence of use of social media and blogging services		We suggest deleting this indicator as it reads as a duplication of the indicator under B.5	
B.7 Are citizens, journalists or bloggers subject to arbitrary detention, prosecution or intimidation for disseminating information online on political and social issues?		We suggest rewording as: "Are journalists, bloggers or other persons subject to prosecution, detention or intimidation for disseminating information online which is protected by the right to freedom of expression?".	
Nature of legal provisions and practice		We suggest deleting "nature of" as it's not the nature of the legal provisions which is relevant but its existence.	
Numbers of detentions and prosecutions for online expression		We think that this indicator requires clarification on the following points: - Is it looking at arbitrary detentions or non-arbitrary detentions (i.e. detention prior to trial or following a criminal conviction). - What the absolute number tells you given the wide variation in populations - Whether it looks at all forms of "online expression" when question B.7 is only looking at "political and social issues".	
B.8 Do journalists or citizens practice self-censorship in order to avoid harassment by government or online abuse?		We suggest replacing "or citizens" with "and other individuals" for the above reasons. This is particularly important here given that non-citizens, such as immigrants and refugees, are actually more likely to face harassment and online abuse.	
Evidence of self-censorship by journalists/bloggers		We suggest replacing "/bloggers" with "or other individuals".	
Evidence of self-censorship as a result of online abuse, particularly by women and children/ young people		We do not think it is clear why this indicator looks only at women and children. Online abuse is disproportionately targeted towards other groups as well such as racial/ethnic minorities, persons with disabilities, LGBT+ individuals, etc. We suggest listing all the groups or having the catch-all "minority, marginalised or otherwise vulnerable groups".	
THEME C – RIGHT TO INFORMATION			
C.1 Is the right to information guaranteed in law and respected in practice?			
Constitutional or legal guarantee of access to information consistent with international rights agreements (including regional agreements) and evidence that it is respected and enforced by government		We suggest deleting "(including regional agreements)" for the above reasons. We suggest replacing "government" with "relevant state organs" for the above reasons.	

Category R - Rights	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
C.2 Does the government block or filter access to the Internet or to specific online services, applications or websites, and on what grounds is this exercised?		We suggest replacing "government" with "government or other state or non-state actors" as it won't always be government which blocks or filters access. It could be regulators, ISPs themselves, or even non-state actors who are in de facto control of a country or region (such as ISIS).	
Evidence concerning formal and informal restrictions on Internet access and use			
Numbers and trend of content access restrictions, takedowns of domain names and other interventions during the past twelve months		<p>This indicator is the only one which is time-limited. We believe that all indicators should have such a time limit (such as twelve months) or none should. Any time limits could be noted in accompanying notes rather than the indicators themselves.</p> <p>We do not think it is clear how "content access restrictions" would be measured. For example, is a single nationwide network shutdown a single restriction? Is taking down 500 Wikipedia pages a single restriction or 500 restrictions? Absolute numbers may not be useful when "restriction" covers such a wide variety of actions, so it might be helpful to define this term here or in accompanying notes.</p> <p>We suggest clarifying "other interventions" or delete.</p>	
C.3 Are citizens, journalists or bloggers subject to detention, prosecution or intimidation for accessing information online, particularly on political and social issues?		We suggest replacing with "Are journalists, bloggers or other persons subject to prosecution, detention or intimidation for accessing or seeking to access information online which is protected by the right to freedom of expression?" This is because there should never be "intimidation" for access to online information regardless of whether it's illegal/harmful or not, but prosecution and detention following a criminal conviction is OK if it's illegal (see also question B.7). It's also unclear why C.3 looks at "detention" but C.2 at "arbitrary detention" and unclear why C.3 looks at all information online but C.2 only at "political and social issues".	
Nature of legal provisions and practice		We suggest deleting "Nature of" for the above reasons.	
Numbers of detentions and prosecutions for access to content which is not prohibited by international agreement		We suggest deleting this indicator as although incitement to hatred is prohibited by international human rights law, merely looking at content which incites hatred should not result in prosecution. This depends on context.	
C.4 Is a wide variety of news sources and viewpoints on issues of national importance available online, without discrimination?		We suggest clarifying certain terms here or in accompanying notes, particularly "of national importance" and "without discrimination". It's not clear what the bases of any discrimination would be.	
Evidence concerning diversity and plurality of local content, including disaggregation by gender and socio-economic factors		We do not think it's clear how local content would be disaggregated by gender or socio-economic factors. Is such disaggregation based on who generated it, who reads it, or about whom the content relates? We suggest considering how this could be measured or that it be deleted.	
Diversity of newspapers and news operations concerned with local news, online and offline		We suggest deleting "and offline" as it's not clear how the diversity of newspapers and news operations offline would relate to the internet.	
THEME D – FREEDOM OF ASSOCIATION AND THE RIGHT TO PARTICIPATE IN PUBLIC LIFE			
D.1 Is freedom of association guaranteed in law and respected in practice?			
Existence of an established legal framework that is consistent with international rights agreements, and evidence that it is respected and enforced by government		This is the same indicator as in A.1. To ensure consistency with B.1 and C.1, we suggest replacing it with: "Constitutional or legal guarantees of freedom of association and the right to participate in public life consistent with [insert relevant international human rights law and standards] and evidence that they are respected and enforced by relevant state organs."	
D.2 Can civil society organisations organise effectively online?			
Evidence of online organisation by civil society, and absence of interference with such organisation		We suggest clarifying whether interference by state actors or non-state actors as well is also included.	

Category R - Rights	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
D.3 Is there a government policy for e-government and e-participation which encourages citizen participation in government?			
Existence of government policies for e-government and e-participation, including use of the Internet for public consultation			
Values/rankings in UNDESA's e-government and e-participation indices		We suggest considering whether this is a source for an indicator rather than an indicator in and of itself.	
D.4 Are government websites available which enable citizens to undertake a wide range of e-government activities securely online as well as offline?		We suggest replacing "citizens" with "individuals" for the above reasons.	
Number of e-government services and users (disaggregated by gender)		We suggest disaggregating by other groups too.	
Extent to which data on e-government sites are protected by encryption and cybersecurity		We suggest rewording as "extent to which data on e-government sites is protected by cybersecurity measures including strong encryption"	
Credible reports concerning cybersecurity of government websites and services (e.g. use of https)		We suggest removing for the above reasons.	
THEME E – PRIVACY			
E.1 Is the right to privacy guaranteed in law and respected in practice?			
Constitutional or legal definition of privacy and right to privacy		We suggest rewording as "Constitutional or legal guarantee of the right to privacy consistent with [insert relevant international human rights law and standards] and evidence that it is respected and enforced by relevant state organs" as this indicator looks not only at the right to privacy but requires a definition. However, there is no universally agreed definition of privacy. It also doesn't require evidence of respect for that right in practice.	
E.2 Is the protection of personal data guaranteed in law and enforced in practice, with respect to governments, businesses and other organisations, including rights of access to information held and to redress?			
Existence of a legal framework for data protection, including monitoring mechanisms and means of recourse and redress, and evidence that it is respected and enforced by government		We suggest replacing "government" with "relevant state organs" for the above reasons.	
Existence of legal framework governing commercial use of personal data and international data transfer, including monitoring mechanisms and means of recourse and redress		This indicator only looks at the existence of a framework, which is not particularly meaningful unless it also considers the extent to which that framework ensures the protection of personal data, requires consent from users before data is used for commercial purposes or transferred abroad, etc. We suggest that these qualifications be added.	
Existence of an independent data protection authority		We suggest replacing with "An independent data protection authority which is equipped with the necessary powers and resources to enforce data protection legislation."	
	We suggest adding as new indicators "Measures of the size and impact of data breaches" and "Public awareness of data protection"		
E.3 Are the powers of law enforcement and other agencies for the surveillance of Internet users necessary, proportionate and limited to circumstances which are consistent with international rights agreements?		We suggest simplifying and rewording as: "Are the powers of law enforcement and other agencies for the surveillance of internet users, as well as their exercise, consistent with international human rights law and standards?".	
Legal framework for surveillance, and evidence concerning implementation		We suggest rewording as: "Legal framework includes transparency and oversight mechanisms".	
	We suggest adding further indicators including laws and practices which permit state agencies to surveil individuals online; requirements made of telecommunications or internet service providers to enable such surveillance; and the extent to which individuals are surveilled in practice.		

Category R - Rights	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
E.4 Are any requirements for identification and registration, including communications registration, necessary, proportionate and consistent with international rights agreements?		We suggest rewording as: "Are any requirements for identification and real-name registration for the use of online services and platforms, necessary, proportionate and consistent international human rights norms and standards?".	
Existence and nature of identity and registration requirements, including verification processes		We do not think the context for "identification and registration" is clear. For what purposes are identification being required? For what services is registration required? Presumably this is referring to registration in order to access and use online services, but it's not clear if this is limited to public services or private services. Greater clarity would be useful. We suggest replacing "agreements" with "law and standards" We think that this indicator requires clarification as to whether it is looking at identification and registration requirements to access/use online public services or other services as well.	
E.5 Are data encryption and online anonymity protected in law and practice in a way that is consistent with international rights agreements		We suggest replacing with "Is the availability of, and ability to use, encryption and online anonymity protected in law and respected in practice, consistently with international human rights law and standards?"	
Existence of a legal framework consistent with international rights agreements and evidence that it is respected by government		We suggest replacing "agreements" with "law and standards" for the above reasons.	
	We suggest adding further indicators including existence of restrictions on the use of ToR, proxies or VPNs; restrictions on the use of encryption, such as general prohibitions of certain types of encryption; weakened encryption standards or the existence of 'backdoors'; maximum permissible strengths of encryption; licensing or registration requirements to use encryption or provide cryptographic products and services; and the lawful interception of encrypted communications or decryption orders.	We suggest replacing "government" with "relevant state organs" for the above reasons.	
E.6 Do citizens have legal rights to protect their online identity and to manage or correct information concerning them online, in ways that protect both privacy and freedom of expression?		We suggest removing or clarifying what "legal rights to protect their online identity" mean. If this indicator is kept, suggest that reference to the ability to "manage or correct information concerning them online in ways that protect both privacy and freedom of expression".	
Legal frameworks and jurisprudence concerning privacy and freedom of expression		We suggest removing for the above reasons.	
E.7 Are government requirements for Internet businesses to provide information to government agencies concerning Internet users necessary, proportionate, transparent and consistent with international rights agreements?		We suggest deleting "necessary, proportionate, transparent and". If the requirements are consistent with international human rights law and standards, they will meet these criteria. We suggest replacing "agreements" with "law and standards" for the above reasons.	
Existence and nature of legal framework and evidence that it is respected by government		We suggest deleting "and nature" for the above reasons. We suggest replacing "government" with "relevant state organs" for the above reasons.	
THEME F – SOCIAL, ECONOMIC AND CULTURAL RIGHTS			
F.1 Do government policies incorporate the Internet in strategies concerned with employment, health and education, with particular reference to ICESCR rights?		We think that clarification needed on whether this indicator is looking at policies or strategies or both as its not clear what "incorporate the internet" means or whether policies/strategies on employment, health and education would have any connection to cultural rights as these are economic and social rights issues.	
Evidence of inclusion of the Internet, and of ICESCR rights, in sector strategies for employment, health and education		We think that this indicator should focus on incorporation of internet-related activities or plans which support access and social rights, or something similar as it's unlikely that cultural rights be included in such strategies and/or why the inclusion of the internet alone should considered an indicator.	

Category R - Rights	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
Evidence of analysis by government of the impact of Internet on employment, health and education			
F.2 Are all citizens equally able to take advantage of the Internet to participate in cultural activity?		We suggest replacing "citizens" with "individuals" for the above reasons.	
Extent and nature of differences in Internet access and use between different communities/ ethnicities		Communities and ethnic groups are very different categorisations. It's probably not appropriate simply to lump them together. We suggest rewording, perhaps "communities or groups which share a particular characteristic".	
Existence or otherwise of government policy concerning cultural heritage online		We suggest deleting "or otherwise" or clarifying its meaning	
Constitutional or legal guarantee of freedom of artistic expression		We suggest replacing with "Constitutional or legal guarantee of the right to take part in cultural life" to ensure consistency with Article 15 of the ICESCR.	

Category - Openness	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
THEME A – POLICY, LEGAL AND REGULATORY FRAMEWORK			
A.1 Is there an overall policy, legal and regulatory framework for Internet development and policymaking which is consistent with international norms concerning openness and transparency?			
Existence of an overall framework consistent with relevant international norms			
Existence of legal and regulatory frameworks to enable e-commerce, digital signatures, cyber-security, data protection and consumer protection		We suggest adding "consistent with international human rights standards".	
A.2 Does the legal and regulatory framework for business, academia and civil society facilitate innovation on the Internet?			
Conduciveness of the legal and regulatory framework towards the establishment of new business ventures and innovation by academia and civil society			World Bank report, "Digital Dividends"
Perceptions of experience of business and ICT regulatory environment by businesses, including Internet-enabled business			
A.3 Are there restrictions on which organisations or individuals can establish Internet, or Internet-enabled, services?			
Legal framework for Internet and Internet-enabled services, including development and use of interoperable technologies from diverse sources			
THEME B – OPEN STANDARDS			
B.1 Does the legal and regulatory framework encourage or constrain investment and innovation using all available technologies?			
Evidence concerning government policy and practice towards online innovation, including procurement		We suggest clarifying what "procurement here means". Is it procurement for the delivery of public services?	
Number and survival rate of Internet-related start-ups		We suggest clarifying "survival rate" and suggest adding "survival rate after three years" (which is a standard measurement in this area - see US Small Business Association).	"Small Business Facts" U.S Small Business Association (https://www.sba.gov/sites/default/files/Business-Survival.pdf)
B.2 Do national standards setting processes conform to international standards including due process, transparency, balance and openness to participation by all interested parties			
Legal and regulatory arrangements for standards processes			
Perceptions of standards processes amongst relevant stakeholders			
	We suggest adding "participation in regional and global standard setting bodies by relevant stakeholders from the country".		
	We suggest adding "existence of a 'national standard setting body'".		
B.3 Does the government facilitate free and open-source software (FOSS)?			
Government policy towards FOSS			
Extent to which FOSS is used in government departments			
B.4 How extensively are developments in Internet protocols and standards implemented within the country?			
Data concerning the extent of IPv4 and IPv6 deployment		This has the potential to become outdated very quickly and should be reworded so as to withstand changes and developments, for example "Data concerning the deployment of the latest internet protocol standard".	
Data concerning the extent of DNSSEC deployment			
	We suggest adding a further indicator with reference to the latest international security standards such as "Data concerning the deployment of the latest international security standards".		
THEME C – OPEN MARKETS			

Category - Openness	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
C.1 Is there independent regulation of communications markets, undertaken in accordance with international norms and standards?			
Existence of an independent regulatory authority/ies and evidence concerning regulatory performance			
	We suggest adding "Existence of an independent regulatory authority/ies" with powers to address anti-monopolistic practices".		
C.2 Are licensing and allocation of critical resources (including spectrum, domain names and IP addresses) flexible, technology- and service-neutral, non-restrictive and non-discriminatory?			
Legal and regulatory arrangements for spectrum, domain names and IP addresses			
Rate of return on licenses and spectrum			
	We suggest adding as a new indicator "Transparency and public participation in debates related to spectrum management"		CIMA "The Power of Airwaves: The Role of Spectrum Management in Media Development"
	We suggest adding as a new indicator "Existence of accountability mechanisms for spectrum auctions"		
	We suggest adding as a new question "Does the government have policies in place to sustain and enhance competition in spectrum auctions (e.g setting aside spectrum to facilitate new entry, establishing new roaming and tower sharing policies)?"		OECD "Wireless Market Structures and Network Sharing"
C.3 Is there independent management of the domain name system?			
Independence of the domain name registrar			
Proportion of domain registrations from the country which are registered as ccTLDs			
C.4 Is there sufficiently effective competition in access networks to protect consumer interests?		We suggest clarifying the meaning of "access networks"	
Number of fixed and mobile broadband providers			
Market shares of fixed and mobile broadband providers (Herfindahl Index)			
C.5 Can Internet users choose between diverse Internet service providers, including domain name registrars, ISPs and online services?			
Number of and distribution of market shares between domain name registrars			
Number of and distribution of market shares between ISPs			
Presence or absence of restrictions on access to international online service providers (including, for example, search, social media, microblogging, news access and e-commerce platforms)		We suggest rewording as: "Presence of restrictions on access to online service providers based outside the country (including, for example, search, social media, microblogging, news access and e-commerce platforms)."	
Extent and diversity of use of national and international online service providers in core areas of Internet use (including, for example, search, social media, microblogging, news access and e-commerce platforms)			
C.6 Are there Internet Exchange Points and effective peering arrangements for exchange of Internet traffic?			
Existence and effective management of IXP(s)		We suggest clarifying whether national IXPs are referred to here.	
Proportion of national traffic using IXPs, including trend		We suggest rewording as "Proportion of domestic traffic using IXPs".	
Latency levels to access national, regional and international servers			
THEME D – OPEN CONTENT			
D.1 Does the government actively promote access to knowledge through its policies for education, culture and science?			
Existence and nature of government policy and practice on access to knowledge			
D.2 Do arrangements for intellectual property protection balance the interests of copyright holders and information users in ways that promote innovation and creativity?			

Category - Openness	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
Nature of the legal arrangements for copyright enforcement			
Government adoption of creative commons and other open access forms of intellectual property		We suggest deleting this indicator and combining it with the indicators under D.3	
D.3 Does the government provide or encourage access to and facilitate sharing of public information			
Existence and nature of government policies on access to and sharing of public information, including availability of creative commons or comparable licences		We suggest rewording as "Use of creative commons and other open access forms".	
D.4 Does the government encourage the use of open educational resources (OER) and facilitate open access to academic resources?			
Educational policy framework concerning OER			
Arrangements for access to academic and scientific resources by higher education institutions and students	In order to ensure there is no discrimination in access, we suggest adding "Higher education institutions provide online access to academic resources, as well as providing access to offline resources"		
D.5 Does the government require ISPs to manage network traffic in a way that is transparent, evenly applied and does not discriminate against particular types of content or content from particular sources?		We suggest rewording this question as: "Does the government require ISPs to provide equal treatment of data traffic across the internet?"	
Regulatory arrangements concerning net neutrality	We suggest adding "Separation between application and network layers of the internet"		
D.6 Does the government allow citizens to publish and access content through protocols and tools of their own choice, including virtual private networks (VPNs)?			
Legal framework and practice concerning the rights of end-users to access content through all available tools, including VPNs		We suggest rewording to "(...) to access and publish content through the tools and platforms of their choice, including VPNs".	
THEME E – OPEN DATA			
E.1 Has legislation been enacted which requires open access to public data, and is that legislation implemented?			
Existence of a legal framework for access to open data which is consistent with international norms and privacy requirements		We suggest rewording as "(...) consistent with international human rights norms and standards".	
Evidence concerning the extent to which open data resources are available and used online			
E.2 Do government departments and local government agencies have websites which are available in all official languages?			
Government policy to ensure provision of websites with appropriate language access			
Proportion of government departments with websites (value/ranking in UNDESA online services index)			
Quality of government websites (extent of language availability, quantity of content, availability of mobile version)			
Proportion of adult citizens who have used e-government services within twelve months			
E.3 Do government and other public stakeholders provide easy online access to publicly-held data sets, including machine-readable access to original data?			
Legal framework concerning freedom of information			
Number and quantity of open data sets made available by government and available through public access facilities			
Availability of public access facilities that can be used for open data access in e.g. educational institutions and libraries			
Data on the extent of use of open data, in total and within country			
E.4 Are provisions concerning the location and duration of data retention consistent with international standards of data protection and supportive of effective access?		We suggest removing "supportive of effective access" as it is unclear what this means.	
Legal and regulatory provisions concerning data retention and cross-border data flows			
E.5 Can individuals and organisations use and share public data without restriction?			

Category - Openness	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
Legal framework concerning freedom of information		We suggest rewording as: "Existence of a legal framework which guarantees freedom of information consistent with international human rights law and standards".	
Presence or absence of restrictions in government policy and practice on the use and sharing of public data			
E.6 Are open data used by stakeholders in ways which have a positive impact on sustainable development?			
Number of access requests for open data from government		We suggest moving this to E.5.	
Evidence of developmental use of open data in selected sectors (e.g. environment, health, agriculture, enterprise)		The use of the word "developmental" here is unclear. We suggest rewording as "Evidence of use of open data in sectors relevant to sustainable development" or "(...) to further the UN sustainable development goals and related targets)".	

Category A - Accessibility to all	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
THEME A – POLICY, LEGAL AND REGULATORY FRAMEWORK			
<p>A.1 Are effective arrangements in place to monitor access and use of Internet?</p>		<p>As worded, this risks suggesting that governments should be monitoring the use of the internet. It should focus solely on statistical data relating to the number of people who have access to the internet and use it in practice, not the way that they use it. We suggest rewording as:</p> <p>"Are statistics collected on access and use of the internet by the population?"</p>	
<p>Arrangements for statistical monitoring access to and use of the Internet, including regular household surveys</p>		<p>We suggest rewording this indicator to ensure consistency with the above recommendations.</p>	
<p>A.2 Is there a legal right to access the Internet and online services?</p>		<p>We suggest deleting this question because the fact that there is no legal right to access the internet doesn't necessarily have a bearing on its accessibility. A legal right to use the internet, but which in practice was ignored, would still be recognised by this question.</p>	
<p>Existence or otherwise of a legal or regulatory entitlement to Internet access</p>		<p>If question A.2 is kept, we suggest deleting "or otherwise" as it's not clear what a non-existent legal or regulatory entitlement would look like.</p> <p>If question, A.2 is kept, we suggest deleting "or regulatory" as it is not clear where a regulatory entitlement to access the internet would not be a legal right.</p> <p>If question A.2 is kept, we suggest adding "which is respected and enforced in practice by relevant state organs".</p>	
<p>A.3 Is there an independent legal or regulatory authority which seeks to implement universal access to communications and the Internet?</p>			
<p>Existence of a legal or regulatory authority with appropriate powers, and evidence of effective regulation</p>		<p>We think that clarification is needed on what "appropriate" means here.</p>	
<p>Perceptions of regulatory performance</p>		<p>We suggest clarifying the following issues: By whom and of what are the perceptions? Is it by the government of its performance against the regulatory framework which established it, or by civil society/individuals of its performance generally?</p>	
<p>A.4 Does the government have a policy and programme to implement universal access to reliable, affordable broadband, and is this effectively implemented?</p>			
<p>Adoption of a universal access strategy and evidence of effective deployment of UA resources</p>			
<p>Statistical evidence of progress towards universal access, aggregate and disaggregated</p>		<p>We suggest adding the explicit characteristics against which the data is disaggregated.</p>	
<p>Consideration should be given and cross-reference made to data/evidence for contextual indicator 3.D, which is concerned with the availability of electricity.</p>			
<p>A.5 Are public access facilities available that provide access to the Internet for those who cannot afford or obtain personal access to the Internet?</p>			
<p>Inclusion of public access in universal access strategy</p>			
<p>Numbers of telecentres, libraries and other public facilities offering Internet access, compared with proportion of the population without personal access</p>		<p>We suggest rewording the comparison to reflect the number of facilities compared with the number of people who don't have personal access to the internet as it is problematic to compare raw numbers with a proportion in this way.</p>	
THEME B – CONNECTIVITY AND USAGE			
<p>B.1 Are broadband networks geographically available throughout the country?</p>		<p>We suggest clarifying what "geographically" means here.</p>	
<p>Percentage of population covered by fixed broadband networks, including bandwidth tiers</p>			
<p>Percentage of population covered by mobile broadband signal, bandwidth tiers (and compared with proportion covered by mobile cellular signal)</p>			
<p>International Internet bandwidth per Internet user</p>			

Category A - Accessibility to all	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
B.2 What proportion of the population subscribes to communications/broadband services, and is this growing?			
Number of fixed broadband subscriptions per hundred population, aggregate and disaggregated		We suggest adding the explicit characteristics against which the data is disaggregated.	
Number of unique active mobile broadband subscribers per hundred population, by bandwidth, aggregate and disaggregated		We suggest adding the explicit characteristics against which the data is disaggregated.	
Number of IP addresses within the country, per hundred population			
B.3 What proportion of the population uses the Internet, with what frequency, and is this proportion growing?			
Proportion of individuals who have ever accessed the Internet, aggregate and disaggregated		We suggest adding the explicit characteristics against which the data is disaggregated.	
Proportion of households with Internet access at home, aggregate and disaggregated		We suggest adding the explicit characteristics against which the data is disaggregated.	
Number of Internet users per hundred population, aggregate and disaggregated, by frequency of use		We suggest adding the explicit characteristics against which the data is disaggregated.	
Number of social media (social networks, microblogs, user-generated video streaming) users per hundred population, aggregate and disaggregated, and by frequency of use		We suggest deleting this because it's not clear why social media websites being measured but not other ways the internet is used e.g. for businesses, shopping, entertainment, e-government, etc.	
Number of visits to social media websites (defined as above) per hundred population		We suggest deleting this for the above reasons.	
B.4 What barriers to access are identified by users and non-users of the Internet?			
Perceptions of barriers to Internet access and use			
B.5 Is the volume of Internet traffic within the country growing significantly compared with other countries?			
Volume of mobile broadband Internet traffic in exabytes (including and excluding video streaming), per citizen, per Internet user, and trend		We suggest replacing "citizen" with "member of the population" for the above reasons.	
THEME C – AFFORDABILITY			
C.1 Are mobile handsets capable of Internet connectivity affordable to all sections of the population?			
Cost of basic mobile handset as a percentage of monthly GNI p.c.			
Perceptions of affordability in household surveys, disaggregated by gender		Other groups are potentially disproportionately affected and we would suggest measuring these as well.	
C.2 Is the cost of broadband access and use affordable to all sections of the population?			
Cost of basic fixed broadband connection and use as a percentage of monthly GNI p.c.			
Cost of basic mobile broadband connection and use as a percentage of monthly GNI p. c.			
C.3 Are universal access/service arrangements in place which seek to reduce the cost of access for poor and marginalised groups within the population?			
Evidence that universality policies and arrangements address affordability in law and practice			
THEME D - EQUITABLE ACCESS			
D.1 Are there significant differences in broadband access between urban and rural areas?		We suggest deleting "significant".	
Geographical coverage in urban and rural areas, by level of bandwidth			
Numbers of mobile broadband subscribers and of Internet users, in urban and rural areas, indicated in household surveys			
D.2 Is there a gender digital divide in Internet access and use and, if so, is this gender divide growing, stable or diminishing? (This question and indicators are also included in Category X Theme A.)			
Proportions of adult women and men using the Internet, compared with other countries and with gender differences in income and educational attainment			

Category A - Accessibility to all	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
Proportions of adult women and men with mobile broadband subscriptions		We suggest rewording as "Proportion of individuals with mobile broadband subscriptions, disaggregated by gender, income and educational attainment" for the above reasons.	
Survey data on patterns of Internet use, disaggregated by gender			
Perceptions of barriers to Internet access and use, and of stated values of Internet access and use, disaggregated by gender			
D.3 Do people in all age groups make use of the Internet to the same extent?			
Proportion of those aged 55 and over who are using the Internet, and frequency of use, compared with those aged 15-24 and 25-54		We suggest clarifying why these three age categories have been selected. Is it because that's the standard for internet use measurement surveys?	
D.4 Are people with disabilities able to make effective use of the Internet?			
Existence of legal and regulatory provisions to promote access and use of Internet by people with disabilities			
Extent of accessibility facilitation on government websites and e-government services			
Proportion of those with and without disabilities who are using the Internet, adjusted to compensate for age differences			
	We suggest adding as a further indicator: "Existence of a legal framework on discrimination on the basis of disability which includes a requirement on the public sector, private sector, and others, to provide reasonable accommodation to online services".		
THEME E – LOCAL CONTENT AND LANGUAGE			
E.1 How many Internet domains are registered within the country and is this number growing?			
Registered domains (including both ccTLDs and gTLDs) per thousand population			
E.2 Is a substantial and growing volume of content about the country available online, including locally-generated content?			
Number of Wikipedia articles/words concerning the country, compared with other countries, including source (proportion generated in-country)		We are not clear why Wikipedia has been singled out as an indicator for the existence of content about a country. If it's not an absolute number of articles or words this may not necessarily be helpful unless other factors such as population and history are taken into account. We would suggest deleting or replacing.	
E.3 Are services available which enable citizens to access and use local scripts and languages online?		We suggest replacing "citizens" with "individuals" for the above reasons.	
Availability of Internet domains and websites in local scripts			
Availability of local languages on major online platforms			
E.4 Is there a substantial and growing volume of Internet content in diverse local languages, including locally-generated content?			
Proportion of population whose principal language and script are available on leading online services			
Availability of content on government websites in all languages with significant user groups within the population			
Proportion of content generated in and read by citizens/residents on leading online services, by language, compared with proportion of total population using each language as their principal language		We suggest replacing "citizens/residents" with "individuals" for the above reasons.	
THEME F – CAPABILITIES / COMPETENCIES			
F.1 Do school and higher educational curricula include training in ICTs and Internet, focused on effective and safe use, and are these curricula implemented in practice?			
Policy concerning school curricula			
		We suggest clarifying the meaning of "appropriate", perhaps in accompanying notes.	

Category A - Accessibility to all	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
Evidence of appropriate educational curricula at primary, secondary and tertiary levels		We suggest deleting "tertiary" as it's not clear that university and other tertiary level education needs to include the internet and ICTs.	
Proportion of teachers in primary and secondary schools with training in ICTs or ICT-facilitated education			
Proportion of schools with computer-assisted instruction			
Proportion of learners who have access to the Internet at school			
F.2 Are media and information literacy programmes (including digital aspects) provided for adults by government or other stakeholders, and used by citizens?		We suggest replacing "citizens" with "individuals" for the above reasons.	
Existence of media and information literacy programmes, and usage statistics, disaggregated by gender		We suggest disaggregating by age and persons with disabilities.	
Perceptions of media and information literacy among users			
F.3 What proportion of the population and the workforce is skilled in the use of ICTs?			
Proportion of Internet users with particular skills, by skill type, aggregate and disaggregated		We suggest adding the explicit characteristics against which the data is disaggregated for the above reasons.	
Proportion of the workforce using ICTs in the workplace, by skill type, aggregate and disaggregated		We suggest adding the explicit characteristics against which the data is disaggregated for the above reasons.	
Proportion of higher education students undertaking STEM and ICT courses, compared with global averages			

Category M - Multistakeholder	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
THEME A – LEGAL AND REGULATORY FRAMEWORK			
A.1 Does the government encourage participation by other stakeholders in national governance through the Internet? (This concerns processes which are not themselves about the Internet.)		We suggest rewording this question as: "Does the government encourage public participation in national policy processes?".	Framework for Multistakeholder Cyber Policy Development, (Global Partners Digital)
Value and ranking in UN DESA E-Participation Index			Framework for Multistakeholder Cyber Policy Development, (Global Partners Digital)
Legal arrangements requiring public consultation and legal and practical arrangements for online consultation processes			Framework for Multistakeholder Cyber Policy Development, (Global Partners Digital)
Number and range of government consultation processes and opportunities available online		We suggest rewording this indicator as: "Number of government consultation processes which allow for public engagement online as a proportion of all policy making processes".	Framework for Multistakeholder Cyber Policy Development, (Global Partners Digital)
Evidence of participation by diverse stakeholder groups in online consultation processes		We suggest disaggregating by gender and socio-economic class.	Framework for Multistakeholder Cyber Policy Development, (Global Partners Digital)
A.2 Is government accountable to citizens and stakeholder communities?		We suggest adding "transparent" to this indicator so that it reads "Is government transparent and accountable to citizens and stakeholder communities?".	Framework for Multistakeholder Cyber Policy Development, (Global Partners Digital)
Constitutional and institutional arrangements for government accountability, and evidence from credible sources that these are implemented in practice	We suggest including indicators which measure the extent to which internet governance and other internet-related policy forums are transparent and accountable.	We suggest adding "with appropriate and effective remedies available for breaches of human rights".	Framework for Multistakeholder Cyber Policy Development, (Global Partners Digital)
THEME B – NATIONAL INTERNET GOVERNANCE			
B.1 Are there active associations of Internet professionals, consumers and other stakeholder communities?		We suggest rewording as "Are there active associations of professionals, consumers and other stakeholder communities which focus on or engage with internet-related policy and governance issues?".	
Existence, membership data (aggregate and disaggregated) and level of activity of relevant associations			
B.2 Does the government actively involve other stakeholder groups in developing national Internet policies and legislation?			
Existence of arrangements for multistakeholder consultation and involvement in national policymaking institutions and processes concerned with the evolution and use of the Internet	We suggest adding further indicators which include information about whether arrangements for stakeholder consultation and involvement are publicly available and accessible, and whether they provide clarity on the process, intended outcomes and roles and responsibilities of the stakeholders.		Framework for Multistakeholder Cyber Policy Development, (Global Partners Digital)
	We suggest including indicators which measure the extent to which internet governance and other internet-related policy forums are open and accessible.		Framework for Multistakeholder Cyber Policy Development, (Global Partners Digital)
	We suggest including indicators which measure the extent to which internet governance and other internet-related policy forums are inclusive.		Framework for Multistakeholder Cyber Policy Development, (Global Partners Digital)
	We suggest including indicators which measure the extent to which internet governance and other internet-related policy forums are consensus-driven.		Framework for Multistakeholder Cyber Policy Development, (Global Partners Digital)
Numbers of non-governmental stakeholders actively participating, by stakeholder group, disaggregated by gender			
B.3 Is there a national Internet Governance Forum which is open to all stakeholders, with active participation from diverse stakeholder groups?			
Existence of national IGF			
Participation data, aggregate and disaggregated, with particular attention to participation by selected groups (e.g. education ministries, SMEs, NGOs concerned with children, trades unions); and including arrangements for remote participation			
Assessment of national IGF reports filed with global IGF Secretariat			

Category M - Multistakeholder	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
B.4 Does the national domain name registry involve all stakeholders in its decision-making processes?			
THEME C – INTERNATIONAL INTERNET GOVERNANCE			
C.1 Does the government actively involve other stakeholder groups in developing policy towards international Internet governance?			
Evidence that government encourages and facilitates multistakeholder preparation for international meetings	We suggest adding an indicator regarding government's involvement of other stakeholder groups in representation at relevant regional policy processes.		
	We suggest adding an indicator regarding the government's inclusion of non-government stakeholders in official national delegations to major international fora.		
C.2 Do government and other stakeholders from the country actively participate in major international fora concerned with ICTs and the Internet?			
Number of participants from different stakeholder groups participating in global and regional IGFs, per million population, aggregated and disaggregated by stakeholder group and gender			
Participation or otherwise of non-government stakeholders in official delegations to ITU, aggregated and disaggregated by stakeholder group and gender			
C.3 Does the government and do other stakeholders participate actively in ICANN?			
Membership of and active participation in ICANN's Governmental Advisory Committee (GAC)			
Membership of and active participation in ICANN constituencies, working groups and other fora			

Category X - Cross-cutting	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
GROUP A – GENDER			
A.1 Are the interests and needs of girls and women explicitly included in national strategies for Internet development, and effectively monitored?			
National strategies include explicit consideration of a) women's needs relating to the Internet and b) the potential of the Internet to support women's rights and equality		We suggest replacing "women's needs" with "the needs of women and girls", and "women's rights and equality" with "gender equality".	
Numbers of women and men in senior policymaking positions in government concerned with ICTs/Internet			
Extent of disaggregation of available data on ICT access and use by gender			
Existence of national mechanisms to monitor women's inclusion in strategies for Internet access and use			
A.2 Is there a gender digital divide in Internet access and use and, if so, is this gender divide growing, stable or diminishing? (This question and some of its indicators are also included in Category X Theme A.)		It appears this question means to refer to Category A, Theme D. If the question and indicators are the same, we suggest that they aren't repeated but combined under a single category with a note to explain why they don't appear in the other.	
Proportions of adult women and men using the Internet, by frequency, compared with other countries and with gender differences in income and educational attainment			
Proportions of adult women and men with mobile broadband subscriptions, compared as above			
Survey data on patterns of Internet use, disaggregated by gender			
Perceptions of barriers to Internet access and use, disaggregated by gender			
Perceptions of value of Internet access and use, disaggregated by gender			
Proportions of women and men involved in internet governance issues		We suggest clarifying "internet governance issues", perhaps in accompanying notes.	
A.3 Do women and men participate to the same degree in use of online services?			
Proportion of Internet users using social media networks, disaggregated by gender			
Proportion of adult citizens using mobile financial services, disaggregated by gender		We suggest deleting "citizens" for the above reasons.	
A.4 Do the law, law enforcement and judicial processes protect women against online gender-based a) harassment and b) violence, without unduly impacting other human rights?		We suggest deleting "without unduly impacting other human rights" as it is not clear how the law or judicial processes, can protect women from harassment and violence in a way that does unduly impact other human rights. Any restrictions on freedom of expression, for example, may be justified if they are to prevent violence, abuse or harassment.	
Incidence of gender-based a) harassment and b) violence experienced by women and girls		We suggest adding "online" before "gender-based" or this indicator will record incidences of harassment and violence which are are unrelated to the internet.	
Evidence of government, law enforcement and judicial action to provide protection to women against online gender-based a) harassment and b) violence		We suggest adding "and girls" after "women".	
A.5 Is the proportion of women in STEM training, employment and Internet leadership significant and growing?			
Proportion of women in STEM employment, by level of skill			
Proportion of women in STEM courses in higher education			
Proportion of women in senior management positions in national Internet-related government departments/roles and Internet/communications businesses			
A.6 Is accurate information about reproductive and sexual health freely available online?			
Presence and/or absence of restrictions on online information about reproductive and sexual health, ease of access and extent of use			
GROUP B – CHILDREN AND YOUNG PEOPLE			

Category X - Cross-cutting	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
B.1 Does the government survey children and young people and/or consult them (and organisations concerned with children) about their use of the Internet?			
Existence of surveys and consultation arrangements explicitly addressed to children, young people and relevant organisations			
B.2 What proportion of children (5-15 or 5-18) and young people (15-25 or 18-25) make use of the Internet?			
Proportions of children and young people making use of the Internet, compared with other countries and with other age groups, disaggregated by gender and other social groups, and by frequency of use		We suggest deleting "social" as not all groups sharing a characteristic will be social groups.	
B.3 How do children and young people perceive and use the Internet?			
Perceptions of the Internet among children and young people, including barriers to use, value of use and fears concerning use			
Data on use of the Internet by children and young people, compared with other age groups (e.g. data on location of use, main type of use, frequency of use)			
B.4 Is there a legal and policy framework to promote and protect the interests of children online, and is this effectively implemented?			
Existence of a policy framework and legal protections consistent with the Convention on the Rights of the Child (CRC), and evidence of effective implementation		We suggest rewording this indicators as: "Existence of a legal and policy framework protecting the rights and interests of children online, consistent with the Convention on the Rights of the Child and other international human rights standards, and evidence that it is respected and enforced by relevant state organs."	
B.5 Do primary and secondary schools have Internet and broadband access?			
Proportions of schools with broadband and Internet access, disaggregated by tier (private/ public; primary/secondary) and location (rural/urban)			
Learner to computer ratio in schools, disaggregated as above			
B.6 Do educational curricula and online services support children's effective and safe use of the Internet?		Due to is overlap of this question with Category A, Themes D.3 and F.1., we suggest bringing them together under a single category with an explanation of why they don't appear elsewhere.	
Evidence of educational curricula focused on effective and safe use of Internet			
Availability of online services to support children's use of the Internet, including child protection services accessible by children			
Usage data of online services to support children's use of the Internet, including child protection services accessible by children			
GROUP C – SUSTAINABLE DEVELOPMENT			
C.1 Do national and sectoral development policies and strategies for sustainable development effectively incorporate ICTs, broadband and the Internet?			
Existence of an up-to-date, comprehensive and forward-looking policy for the development of ICTs, broadband and the Internet		We suggest replacing "up-to-date" with "developed in the previous five years".	
Inclusion of up-to-date policies and strategies for broadband and the Internet in national strategies to monitor and achieve the UN's 2030 Agenda for Sustainable Development and Sustainable Development Goals (SDGs)		We suggest clarifying what is meant by "forward-looking" as it's not clear what this necessarily means.	
Inclusion of up-to-date policies and strategies for broadband and the Internet in selected economic and social sectors (such as enterprise, agriculture, education, health)		We suggest replacing "up-to-date" with "developed in the previous five years".	
C.2 Does the government have an agreed policy on the management of e-waste and is this implemented effectively		We suggest deleting this question as the link between e-waste and internet universality is not clear.	

Category X - Cross-cutting	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
Existence of a national policy on e-waste, and evidence concerning implementation			
E-waste collection rate			
C.3 Are there adequate arrangements in place for monitoring the development of the Internet and its impact on society?			
Existence of national statistical office			
Arrangements for statistical monitoring of Internet access and use, including household surveys			
Arrangements for regular review and revision of policies relating to the Internet and its impact on sustainable development			
C.4 Does the government have a long-term strategy to address new developments in information technology and incorporate these in development, with multistakeholder participation?			
Existence and composition of a strategic forum or equivalent addressing issues such as artificial intelligence, algorithmic decision-making etc.			
C.5 What proportion of adult citizens make use of major online services?		This question overlaps with Category A, Themes B and D. If the question and indicators overlap, we suggest that they aren't repeated but combined under a single category with a note to explain why they don't appear in the other. We suggest replacing "adult citizens" with "adults" for the above reasons.	
Proportion of adult citizens using e-government services in specific categories, aggregate and disaggregated		We suggest replacing "adult citizens" with "adults" for the above reasons.	
Proportion of adult citizens using mobile and online financial services, aggregate and disaggregated		We suggest replacing "adult citizens" with "adults" for the above reasons. We suggest adding the explicit characteristics against which the data is disaggregated.	
Proportion of adult citizens using online learning services		We suggest replacing "adult citizens" with "adults" for the above reasons. We suggest adding the explicit characteristics against which the data is disaggregated.	
Proportion of adult citizens using online health services		We suggest replacing "adult citizens" with "adults" for the above reasons.	
C.6 What proportion of public service facilities have Internet access?			
Proportion of primary schools with Internet access			
Proportion of clinics with Internet access			
C.7 What proportion of businesses, including small and medium sized businesses make use of the Internet and e-commerce?			
Proportion of business-to-business activity undertaken through e-commerce			
Proportion of SMEs using the Internet, by type of access			
Proportion of SMEs trading (and exporting) online			
Volume of business-to-business and business-to-consumer activity as a proportion of total relevant activity			
Perceptions of value of Internet use by SMEs			
GROUP D – TRUST AND SECURITY			
D.1 Is there a national cybersecurity strategy, with multistakeholder engagement, including a national computer emergency response team (CERT) or equivalent?			
Existence of cybersecurity strategy, with multistakeholder involvement, which is consistent with international standards			
Establishment of national CERT or equivalent, and evidence concerning its effectiveness			
D.2 Is there a legal and regulatory framework for consumer rights online?			
Existence of an established legal framework and implementation in practice			

Category X - Cross-cutting	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
D.3 Have there been significant breaches of cybersecurity in the country within the last three years?			
Number and extent of breaches, and numbers of citizens and businesses affected		We suggest replacing "citizens" with "individuals" for the above reasons.	
Perceptions of Internet security			
Arrangements for and data concerning phishing, spam and bots in national level domains			
D.4 Are citizens and businesses taking action to reduce risks to their security and privacy?		We suggest replacing "citizens" with "individuals" for the above reasons.	
Proportions of Internet users with up-to-date malware protection			
Evidence of business awareness of and contingency plans to counteract cybersecurity attacks			
Extent to which encryption services are used by citizens and businesses		We suggest replacing "citizens" with "individuals" for the above reasons.	
D.5 Do citizens and businesses show a high level of awareness of cybersecurity risks and a high level of trust in the security of the Internet?		We suggest replacing "citizens" with "individuals" for the above reasons.	
Perceptions of trust in the Internet and online services and awareness of cybersecurity risks among citizens and businesses		We suggest replacing "citizens" with "individuals" for the above reasons.	
GROUP E - LEGAL AND ETHICAL ASPECTS OF THE INTERNET			
E.1 Is there a national policy framework concerned with legal and ethical challenges raised by usage of the Internet which is consistent with international rights agreements?		We suggest replacing "agreements" with "law and standards" for the above reasons.	
Existence and assessment of national legal frameworks concerned with hate speech, harassment and discrimination online and offline, which are consistent with international rights agreements		We suggest replacing "agreements" with "law and standards" for the above reasons. The question asks about policy frameworks, but this indicator is solely about legal frameworks, so we suggest amending for consistency. Hate speech, harassment and discrimination are all legal issues, not ethical issues, so we suggest deleting "and ethical" from E.1 if no further ones are added.	
E.2 Are there any multistakeholder or private sector self-regulatory bodies concerned with ethical aspects of the Internet?		We think that some clarity is needed here or in accompanying notes on what are the "ethical aspects of the Internet".	
Existence or otherwise of relevant multistakeholder or self-regulatory bodies			
E.3 How do citizens perceive the benefits, risks and impact of the Internet within the country?		We suggest replacing "citizens" with "individuals" for the above reasons.	
Perceptions of the benefits, risks and impact of the Internet, disaggregated by gender		We think that other groups should be measured as well.	
E.4 Do Internet users in the country report experiencing significant harassment or abuse at the hands of other Internet users which deters them from making full use of the Internet?			
Data on the extent to which Internet users report harassment or abuse, with particular attention to specific social groups (including women, ethnic and other minorities, and political activists)		We suggest deleting "social". Not all groups sharing a characteristic will be social groups.	
E.5 Do Internet users in the country report experiencing significant levels of cybercrime?		We suggest replacing "report experiencing" with "experience" as it should be presumed that the reports are the sources for the indicators and not the question.	
Number of reports of Internet-enabled crime by category per thousand people, compared with other countries		We suggest referring only to "cybercrime" as it is not the same as "internet-enabled crime". For example, racially abusing someone via a social media platform, is an "internet-enabled crime" but not necessarily a "cybercrime". We suggest that a single term is used consistently, accompanied by a clear definition.	
Number and trend of prosecutions for cybercrime			
Perceptions of the Internet and Internet content (in household surveys and opinion polling)			

Category X - Cross-cutting	Are there any additional themes, questions or indicators which you believe should be included in the framework?	Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?	What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?
Evidence from credible sources concerning the prevalence of online disinformation		We suggest clarifying what it meant by "disinformation" as it is a contested term.	
E.6 Is there adequate protection for e-commerce consumers?			
Legal framework for online consumer protection			
Number (and trend) of complaints and prosecutions related to online consumer protection		As consumer law is for the most part an issue of civil, not criminal law, we suggest replacing "prosecutions" with "cases brought"	
Perceptions of the adequacy of protection against online fraud and criminality			
E.7 Do citizens believe that the content of online sources of information is determined or manipulated by the government, foreign governments, commercial or partisan interests?		We suggest replacing "Do citizens" with "Does the population".	
Evidence from credible sources of government or other stakeholders seeking to disseminate disinformation			
Perceptions of the Internet and Internet content (in household surveys and opinion polling)			